

CLERK OF SUPREME COURT, U. S.
FILED
SEP 18 1950
CHARLES ELMORE BROFFLEY

Supreme Court of the United States

OCTOBER TERM, 1950

No. 12 ORIGINAL

UNITED STATES OF AMERICA, Plaintiff

versus

STATE OF LOUISIANA

**MOTION FOR LEAVE TO FILE BRIEF
BY AMICUS CURIAE**

Comes Frank J. Looney, a member of the bar of this Court, and moves for leave to file a brief as Amicus Curaie to this case.

The purpose of this brief is to call the Court's attention to decisions of this Court and its justices attesting to the existence of the Marine League when and before the constitution was adopted and its recognition by "all public writers." (Story)

And to show that Thomas Jefferson as Secretary of State treated this principle as accepted by all nations.

None of these decisions cited in the brief have been presented heretofore.

This appearer was consulted by the Assistant to the Attorney General of Louisiana who had charge of the case; but appearer did not concur in the theory of the State's answer or its brief.

The Solicitor General refuses his consent but states he will not oppose this motion. The Attorney General of Louisiana, who tenders no other brief, approves this filing.

FRANK J. LOONEY
As Amicus Curiae